

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA)	
)	
<i>Plaintiff</i>)	
v.)	No. 20 CR 111-3
)	
JUSTIN HINES)	Honorable Virginia M. Kendall
)	
<i>Defendant.</i>)	

**DEFENDANT'S UNOPPOSED MOTION TO MODIFY THE TERMS OF
HIS SENTENCE OF COMMUNITY CONFINEMENT TO TIME SERVED**

Defendant, Justin Hines, by and through his attorneys, VICTOR P. HENDERSON and KIMBERLY N. TARVER, respectfully moves, *unopposed*, to modify the terms of his sentence of community confinement to time served stating the following:

1. Following his plea of guilty, on February 23, 2022, Mr. Hines was sentenced to six months community confinement, two years probation, and a \$10,000 fine. (*See*, Dkt. 315).
2. Mr. Hines reported to community confinement on March 25, 2022, or about four months ago. (*See*, Dkt. 319 and 321).
3. Since reporting for confinement, Mr. Hines has been fully compliant with the terms of his confinement and all the requirements set by Probation.
4. With the agreement and support of his Probation Officer, Jay Nichols, Mr. Hines commutes between his home, and the Salvation Army, to work.
5. Mr. Hines is the primary financial provider for his family.

6. Mr. Hines has incurred significant financial strain and expense over the past four months traveling nearly 100 miles per day roundtrip between work and the Salvation Army commuting in a 12-year-old vehicle with over 300,000 miles.

7. Jay Nichols has indicated his full support of the request for early termination.

8. Defense counsel, Victor P. Henderson, also spoke with *former* AUSA Terry Kinney who does *not* oppose the motion.

9. Mr. Kinney said that he would relay his non-opposition to the AUSA who will take his place on this case upon the filing of this motion.

10. As an alternative to early termination, Mr. Hines respectfully requests that he be given home confinement in keeping with the original recommendation made by Probation on or around November 30, 2021 (*See*, Dkt. 284, p.20, ¶19(a)(ii)).

WHEREFORE, Defendant Justin Hines respectfully requests this Court to modify his community confinement sentence to time served, or to home confinement, and for such other and further relief as this Court deems just.

Respectfully Submitted,
DEFENDANT, JUSTIN HINES

By: /s/ Victor P. Henderson
One of his Attorneys

Victor P. Henderson
Kimberly N. Tarver
HENDERSON PARKS, LLC
140 S. Dearborn Street, Suite 1020
Chicago, Illinois 60603
Tel: (312) 262-2900
vhenderson@henderson-parks.com
ktarver@henderson-parks.com

CERTIFICATE OF SERVICE

I hereby certify that on July 20, 2022, I electronically filed **Defendant's *Unopposed Motion To Modify The Terms Of His Sentence Of Community Confinement To Time Served*** with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record.

By: /s/ Victor P. Henderson